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March 21, 2011

Shri S.L. Bunker
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Re: Joint Comments on the draft CCI (Procedure in Regard to the Transaction of Business Relating to Combination) Regulations

Dear Mr. Bunker & Mr. Sharma:

On behalf of the American Bar Association Sections of Antitrust Law and International Law, we are pleased to submit the attached Joint Comments on the draft CCI (Procedure in Regard to the Transaction of Business Relating to Combination) Regulations.

Please note that these views are being presented only on behalf of the Sections of Antitrust Law and International Law. They have not been approved by the House of Delegates or the Board of Governors of the American Bar Association and should not be construed as representing the position of the American Bar Association.

If you have any questions after reviewing these comments, we would be happy to provide further input.

Sincerely,



Salli A. Swartz
Chair, Section of International Law



Allan Van Fleet
Chair, Section of Antitrust Law

